# TOWING SAFETY ADVISORY COMMITTEE

DEPARTMENT OF TRANSPORTATION

UNITED STATES COAST GUARD

Minutes of Meeting held
Friday, September 13, 2002
U.S. Coast Guard Headquarters
Washington, DC

***[These minutes, enclosures, and other TSAC information are available on the Internet at http://www.uscg.mil/hq/g-m/advisory/index.htm]***

## ATTENDEES

**Coast Guard Staff**:
Captain Michael W. Brown; Chief, Office of Operating and Environmental Standards (G-MSO); Executive Director
Mr. Gerald P. Miante; (G-MSO-1); Assistant Executive Director
CDR Brian Peter; Chief, Maritime Personnel Qualifications Division (G-MSO-1)
Mr. Dave Beach; Office of Compliance (G-MOC-3)
LCDR Jung Lawrence; Port Security Directorate (G-MP)
LTC Daniel Encinas; Army Corps of Engineers Liaison, Office of Port Security (G-MPS)
Mr. Scott Kuhaneck; Office of Compliance (G-MOC)

**Committee Members**:

Mr. Jeff Parker; Vessel Operations Manager, Allied Transportation Company; Chairman
Mr. Rex H. Woodward; President, Premier Marine, Inc.; Vice-Chairman
Ms. Cathy S. Hammond; President, Inland Marine Service
Mr. Mario A. Muñoz; Risk Analyst; American Commercial Barge Line, LLC
Ms. Diane Goncalves; Government Relations Rep.; Transportation Institute
Mr. James G. Daley; Operations Manager (Contracts); Crowley Marine Services
Ms. Jennifer A. Carpenter; Senior Vice President; American Waterways Operators
Mr. James C. DeSimone; Vice President; Great Lakes Towing
Ms. Marina V. Secchitano; Regional Director; Inland Boatmen's Union of the Pacific
Mr. Gerard Maurice; President; Sunset Marine, LLC
Mr. Jeff Zimmermann; General Superintendent, Marine Vessels; J. Ray McDermott, Inc.
Ms. Laurie Frost Wilson; President, LFW Attorney-at-Law

## Introduction and Welcome

The Coast Guard held a public meeting of the Towing Safety Advisory Committee (TSAC) at Coast Guard Headquarters on Friday, September 13, 2002 ***(Enclosure 1)***. This session followed meetings of TSAC's working groups on Crew Alertness, Licensing Implementation, Towing Vessel Regulatory Review, and Increasing Maritime Security held on the previous day, Thursday, September 12, 2002 ***(Enclosure 2)***.

TSAC Chairman, Mr. Jeff Parker called the meeting to order at 0815 welcoming everyone back to Washington, DC after a very pleasant and successful spring meeting in San Francisco. He praised the Committee and several attending members of the public for their progress in the previous day's working group meetings that were held in plenary, rather than in individual groups, due to the relatively small number of total attendees.

Captain Brown welcomed the Committee, thanking them and members of the public alike for attending. He began with several administrative and mandatory Federal Advisory Committee Act (FACA) announcements. He expressed the regrets of Committee Sponsor RADM Paul Pluta, for not being present as he is in London attending an International Maritime Organization (IMO) intersessional meeting on Port Security. A series of these meetings, that began last year, have as their goal to present an instrument that addresses security for ratification at the full assembly meeting in December. This mechanism would be a Security Code that would require a variety of items regarding vessels and facilities as well as mariners. From this Code, the Administration would develop certain regulations that would harmonize domestic and international requirements to assure both the country's security while not putting U.S. mariners, firms and businesses at a competitive disadvantage relative to their international counterparts. He went on to say that he was pleased to respond, during the working group session on the previous day, to the Committee's request to be involved with the development of certain policies for which it had not heretofore been consulted. He suggested that, in the future, should the Committee believe that the Coast Guard might not be as forthcoming as needs to be for the Committee to fulfill its function in the role of advisor to the Secretary, that it bring the fact to the Coast Guard's attention.

## Existing Business

Mr. Parker called for a motion to accept the minutes of TSAC's spring 2002 meeting. Ms. Secchitano suggested several corrections: On page 5, in the second full paragraph, amend the sentence to read, "Ms. Secchitano expressed concern…….monumental task probably taking ***many*** years." On page 6, 2nd paragraph, revise the sentence to read "Ms. Secchitano further expressed ***the view*** that perhaps the CG ***should*** require MMDs for all inland mariners." The amended minutes were unanimously accepted.

Mr. Parker next brought up the question of the status of the expiring members. CAPT Brown announced that the CG had announced the upcoming vacancies, has received sufficient applications, and is in the finishing stages of preparing a slate of recommended

candidates to fill those vacancies. The slate must clear several offices within the Coast Guard before being forwarded to the Secretary of Transportation (SECDOT). Surely the Secretary has many demands for his time, especially with the creation of the new Department of Homeland Security and considering his part in that process. Slate approval has typically taken about six months to clear at the Department level. Since the Committee charter provides for expired members to continue in service until relieved, Mr. Parker asked those members present whose terms end on September 30, 2002, (Ms. Hammond, Mr. Muñoz, Mr. Woodward, and Ms. Secchitano) if they would voluntarily remain active until their successors are named. All four stated that they would continue.

Ms. Wilson asked if any details of the Coast Guard's role in the new Department of Homeland Security were known. CAPT Brown stated that our goal is that the Coast Guard would move to the new Department as one entity, intact, along with its present authorities and responsibilities. In cases where statutory authority is given to the Secretary of the Department in which the Coast Guard operates, there should be a smooth transition. However, if authority is given specifically to the Secretary of Transportation, and further delegated to the Commandant, then the transition team will have to work with the Office of the Secretary (DOT) as to which of the Coast Guard's many responsibilities would be retained within DOT and which might be transferred to the new Department.

Mr. Parker reminded the Committee that, since April 1994, TSAC and the Coast Guard have been working on revising the process for the Licensing for Officers of Towing Vessels. Ms. Carpenter, Chair of the Licensing Implementation Working Group, gave an overview of recent developments on the rulemaking beginning with the publishing of the Interim Rule that took effect in May of 2001. She pointed out the feature that in order for an Apprentice Mate (Steersman) to advance to Mate (Pilot), a candidate must complete a Towing Officer's Assessment Record (TOAR) having their proficiency assessed by designated examiner. TSAC first developed the TOAR itself and subsequently was asked to develop detailed criteria for carrying out the assessments. The Committee, at its spring 2002 meeting, provisionally accepted the working group's criteria and suggested releasing them to the towing industry for use on a trial basis. The working group has so far received very positive feedback. She moved to have the Committee approve the submission of the assessment criteria as a formal TSAC work product. As a caveat to her request, she pointed out that the Coast Guard, following up on a commitment made at the March 2002 meeting, published the draft criteria in the August 6, 2002 Federal Register (67 FR 50975) as a Notice of Availability. The notice contained a request for comments that are due October 7, 2002 from the public. Therefore, in approving the work product, TSAC would be assured that the working group would further review any input received by the docket, and make final recommendations to possible changes to the TOAR and its assessment criteria by the end of October, 2002. Another recommendation Ms. Carpenter put forth stems from the Committee's authorization for the working group to do a comparison of the assessment criteria in the Near Coastal/Oceans routes TOAR with the requirements of STCW. She recommends that a candidate who is subject to both this TOAR and the STCW, be required to complete only those elements of the TOAR that were *NOT* already assessed within the STCW process. She promised that the Near Coastal and Oceans contingent of her working group would identify just which elements

were not already captured in STCW. The working group would report its findings at the next TSAC meeting.

Mr. Parker commented that the NMC should notify the RECs to promote information on the licensing for towing vessels, the endorsements required, and any paperwork necessary to complete the licensing process. CAPT Brown asked if mariners are unaware of the requirements necessary to complete the process. Mr. Parker answered that not only are many mariners unaware of what they should be asking for, but that RECs often do not offer choices to individuals as to what they might be eligible for, or what information exactly is necessary to appear in the candidate's Sea Service Letter for various endorsements. This results in a mariner renewing his license without the new towing vessel endorsement, rendering it ineligible for service on towing vessels.
Ms. Carpenter suggested that TSAC formally request that the NMC provide information to the public and guidance to the RECs that towing vessel endorsements are required on new licenses and for those mariners who renew licenses who wish to retain the ability to operate towing vessels after May 21, 2001. This could be accomplished by providing model language for inclusion in service letters and modification of the license application to include a question similar to "Do you wish to also apply for a towing endorsement?" CAPT Brown stated that the suggestion would be appropriate.
A motion to accept Ms. Carpenter's wording of a resolution to the NMC ***(Enclosure 3)*** was passed. A motion to accept the assessment criteria, subject to the working group review of public comment and STCW competencies, passed unanimously.

Ms. Secchitano suggested that a mariner's application be reviewed at the REC at the time it is made to reduce the frequency of returned paperwork. Mr. Parker pointed out that the NMC and the RECs are in the process of reviewing their internal processes to provide better service to their customers.

Mr. DeSimone reported on the Security Working Group's review of the Coast Guard's Navigation and Vessel Inspection Circular (NVIC) on Vessel Security. CAPT Brown asked for any particularly disagreeable aspects of the NVIC. Mr. DeSimone cited the recommendation that a company assess its security weaknesses might render it liable at some future date. Ms. Wilson pointed out that many plans would be considered proprietary information, and that it is virtually impossible for a company to follow other recommendations such as predicting the scope of a possible accident scenario in way of injuries, monetary results, deaths, property damage and impact on the environment; such conjecture is limited only by the imagination and might not be supportable by fact. Mr. Parker suggested that of the three broad scenario assessments called for the NVIC, the catastrophic would be the most difficult. Ms. Carpenter pointed out the relatively short time available for the Committee to render its recommendations on the Coast Guard's 'family of security plans' and suggested that: 1) The Coast Guard might accept an approved industry plan in lieu of, and as meeting the intent of, a NVIC; 2) The language concerning the assessment processes now in the NVIC be scaled back and more effectively communicate its intent, since many of the Committee's concerns turned out not to be the intent of current draft language, although it does convey a harsher standard; 3) Consideration must be given to protect security-sensitive information; and 4) The

Coast Guard be urged to consider the technical changes the Committee made in its review on the previous day regarding the Vessel Security NVIC.
Ms. Secchitano suggested that a fifth item be added that would state that the mariner should be considered a '*prime resource*' in maritime security, **not** a '*prime suspect*;' and also, a sixth item, that if background checks become part of the identification credentialing process, that the mariner is offered protection similar to that afforded in drug testing cases. Mr. DeSimone motioned for the Coast Guard's consideration of TSAC's security resolution ***(Enclosure 4)***; it passed unanimously.

Mr. Woodward presented the Crew Alertness Working Group's report relating to its involvement with the Coast Guard ***(Enclosure 5)***. He reported on the group's resolution ***(Enclosure 6)*** that the Committee adopt the Coast Guards Crew Endurance Management System (CEMS) as the right approach for addressing and managing endurance and alertness issues in a 24-hour-a-day towing vessel operation. Also, he pointed out that for the system to be most effective, CEMS be implemented across the towing industry. The Train-the-Trainer lesson plans and the CEMS program will be released by Coast Guard in the near future.
Ms. Secchitano suggested that the TSAC report accompany the Coast Guard CEMS program in whatever form the program is distributed to the public.
Ms. Carpenter expressed concern that TSAC's three-hour work product might be discerned as one that has equal validity to the long-term scientific research product of the Coast Guard R&D Center. She suggested that the TSAC material be labeled as such, and not allow the illusion that it is necessarily part of the larger study.
Ms. Wilson requested clarification on what exactly the Committee is being asked to recommend. CAPT Brown explained that CEMS is a documented process with a variety of techniques and strategies to improve alertness aboard towing vessels. On the other hand, the TSAC product is endorsing that process and putting forward 14 particular risk factors with suggestions for mitigating these circumstances irrespective of the final towing vessel study. Mr. Daley pointed out that the Committee's endorsement of CEMS does not necessarily mean that *all* suggested measures must be adopted by *all* companies. TSAC advocates the (voluntary) use of CEMS and further, recommends 14 additional risk factors for (voluntary) consideration. The motion to accept the working group work products and forward them to LT Calhoon's CEMS team passed unanimously.

Mr. Parker assured the Committee and the public that, in accepting and recommending CEMS to the industry, the Committee is not using the system to cover up or avoid discussion of alleged violation of work-hour or manning rules. TSAC strongly supports stringent enforcement of work-hour regulations and strongly urges the Coast Guard to dedicate resources to their enforcement.

Mr. Muñoz gave a report of the Towing Vessel Regulatory Review Working Group's study at its meeting at USCG HQ on August 13/14, 2002 ***(Enclosure 7)***. They reviewed the Task Statement (# 02-01 – available on the Committee's web site under Enclosures to March 2002 meeting), and identifying common goals that enhance safety throughout the towing industry. There are four main areas of focus in the Task Statement. The work began by identifying potential gaps in the regulations and specific resources that may be used to address them. The group defines "gap" either, as a regulation that does not exist,

a regulation that lacks adequacy, or one that is not being enforced or complied with at this time. The enclosure shows approximately 38 gaps categorized into 4 major groups: compliance/enforcement, human factors, firefighting/lifesaving and hull construction, with a few training issues added. This completes the first task in the statement, i.e., review and identification of the regulatory gaps. The working group is now in the research phase of its work on several resources that are identified in the enclosure: NVICs, the Marine Safety Manual, and the Gulf Coast Mariners Association's (GCMA) "Blue Book." He made the spreadsheet available to all present asking everyone to review it and help identify additional resources that the working group might address at its next meeting. A final working group report to the Committee is possible at the fall 2003 meeting. Discussion followed on electronic versions of available resources, the venue for the three or four working group meetings needed to finish the task, and the Committee's ability to recommend regulation revision when gaps are identified. Mr. Plant and Mr. Block asked about additional comments and resources relative to the spreadsheet.

## Briefings

Mr. Kuhaneck presented information ***(Enclosure 8)*** on the applicability of the International Convention for Safety of Life at Sea, 1974 (SOLAS) and other requirements for certain towing vessels on international voyages. This material represents a work-in-progress and should be considered to be in *DRAFT* status until specific details are further studied and resolved. The project was brought about by the fact that several of our vessels have been intervened and subsequently detained in foreign ports because they were found not to be in compliance with SOLAS. Even though towing vessels are "uninspected" in the U.S., they ARE subject to certain international regulation due to their status as outlined in footnote 6 of table 24.05-1(a) in Title 46 Code of Federal Regulations (46 CFR) that states: "Any vessel on an international voyage is subject to the requirements of SOLAS." If a Port State Administration detains a vessel, it can significantly cost the company both time and money through lost vessel productivity or business, time-consuming transmission of necessary documents, or transportation of qualified/additional personnel. These detentions may cause a country to slip from the so-called "White List" to a "Gray List" of lesser status. If an Administration's vessels continue to suffer further detentions, it could fall to a "Black List" status. He also discussed certain vessels' subjectivity to various international regulations dependant on its domestic Gross Register Tonnage [GRT] and its international Gross Tonnage [GT –(ITC)], and the year it was built. Ms. Carpenter requested that the Office of Compliance develop and issue guidance for companies whose vessels might be detained. Due to the complexity of the tonnage issue and its applicability to SOLAS as well as the International Convention for the Prevention of Pollution from Ships, 1973 (MARPOL 73/78) requirements, especially for vessels built before 1994, Mr. Kuhaneck offered personal assistance to any one who might wish to discuss particular concerns. As a final note, he reminded the membership that, in most cases, applicability to international regulations and conventions is based on the vessel's ITC tonnage and not necessarily its GRT.

After some research, Mr. Kuhaneck returned to impart additional information regarding conformity with the International Safety Management (ISM) Code. Part of the

compliance problem stems from a definition used in SOLAS. Going strictly by the definition in Chapter IX, one may infer that towing vessels are not covered. However, per SOLAS definition, an Uninspected Towing Vessel is considered a "Cargo Ship." SOLAS has only two classifications: a "Passenger Vessel" (carrying over 12 passengers) or "something other than a Passenger Vessel," generically termed a "Cargo Ship." Within this latter category, the applicability for ISM is for other Cargo Ships (UTVs) and MODUs 500 GT (ITC) and upwards, and is required not later than 1 July 2002. This chapter applies to all ships, regardless of the date of construction. This requirement cannot be grand fathered, as in MARPOL and SOLAS, using the tonnage reconciliation letters previously discussed. Mr. Paris offered his organization's newsletters as resources in this matter at www.offshoremarine.org.

LCDR Lawrence introduced Port Security Assessments (PSA) with a program brochure ***(Enclosure 9)***. The initiative is a result of Presidential Directive 63 that charges government agencies to identify minimum critical infrastructures for the health of the national security and economic viability. Since the Coast Guard is responsible for addressing waterborne commerce, the PSA program fulfills this task. Under the program, the CG will identify critical infrastructure and conduct vulnerability assessments. The brochure is a marketing tool to inform stakeholders of our program. TSAC is listed as a participant for input to the process and for help in identifying best practices. We will share the results with stakeholder who will ultimately assist us in developing Port Security Plans. When asked for the plan of action, she answered that we have agency representatives traveling with a contract team of security experts performing the assessments. We have completed four federally-funded exercises (Corpus Christi, San Diego, Boston, and Portland, ME) concentrating on top military and economically strategic ports, developing a more streamlined process that will ultimately be part of a self-assessment tool to be shared with smaller ports. CAPT Brown asked what role the shipping company might play in this initiative. LCDR Lawrence answered that, at first, the process concentrates on the physical aspects of security, such as ports, facilities and vessels. Now, we are bringing 'activities' into the process - how each of these aspects interfaces or reacts with one another. Industry input is welcome and stakeholders will be notified prior to assessments in their area. Mr. Parker asked if any formal public meetings for stakeholders are envisioned. The answer was a description of the process: first, a pre-assessment team meets with stakeholders to explain the process as well as terms of their participation. After a certain time, during which logistics are coordinated, the Assessment Team would meet again with stakeholders who may have identified other participants, such as operators, security managers of facilities, etc. Due to the nature of shipping, many stakeholders may not "reside" in the many locations they serve. Again, this is one of the reasons the program focuses not only on "physical structures", but also on the "operational activities" around them. She assured the membership that all voices identified and wishing to participate would be heard during the process. She announced that pre-assessments are scheduled for Beaumont/Port Arthur and Detroit.

Lieutenant Colonel Encinas presented information on the Inland River Security Partnerships ***(Enclosure 10)***. This initiative works as a steering committee to address port security concerns and integrate various efforts, e.g., the American Waterways Operators (AWO) Security Plan; the USCG Port, Vessel, and Facility Security

Assessment NVICs; and the Corp's Assessment on Locks, Dams and Levees. These processes are necessary to permit functioning in a threat environment, minimizing risk while maintaining near-normal operational objectives. A critical element in the initiative is information exchange between the USCG and the Corp both at the command and District/MSO levels. When the plan is worked out on this plane, industry and some Advisory Committees will be consulted. Mr. Paris asked if the Colonel had input on critical infrastructure from waterways stakeholder, e.g., a barge company. He answered that the priority list was developed at the Corp's District level and he was unsure who might have been consulted at that time. Ms. Wilson asked about the method of reporting security concerns. The answer is that National Response Center (NRC) has an 800 number (promulgated in NVICs and in the AWO Security Plan) manned 24/7. Also, a report can be made to the CG Operations Center. Mr. Parker suggested that stickers or placards, similar to those produced for pollution reporting, be made available for posting in wheelhouses, etc.

Ms. Carpenter, standing in for CAPT Mike Karr, Office of Investigations and Analysis, gave a history on the Bridge Allision project being developed as an element of the safety partnership between USCG and AWO. She informed the Committee that in the last year there have been 22 fatalities as a result of two incidents involving barges, towing vessels, and bridges. Even though TSAC has been instrumental in effecting many regulatory and non-regulatory advancements in towing safety, the safety partnership is an additional effort to compliment the AWO Responsible Carrier Program (RCP). A working group was formed to study the allision problem and come up with solutions to mitigate the risk and likelihood of further occurrences. Members include USCG representatives from HQ (G-MOA, G-MSE, G-MSO, and G-MW), and the Eighth CG District. On the industry side, west and east coast, GIWW, and Mississippi and Ohio Valley River system active captains are on board. The first meeting in July was to define the problem: a) allisions continue to occur and b) they have caused deaths, injuries and property damage that are unacceptable. The group defined three key goals: 1) Attempt to determine just what is going on, i.e., develop a profile of these incidents- how many, where, under what conditions, etc.; 2) What measures have been already taken to reduce the risks of such allisions; and 3) Develop recommendations to minimize the risk of future incidents. When known, the group will also determine how to effectively communicate their findings and recommendations to all appropriate stakeholders. The group is currently studying data and will then develop a root cause analysis to support the first goal. To accomplish this, geographical sub-groups will meet to study cases in their areas of expertise. Mr. Block stated that the GCMA has been studying the allision problem and has published a report following the Webbers Falls, OK incident. He offered their ideas in support of the initiative and announced that their website contained all the Organization's reports [www.gulfcoastmariners.org].

Mr. Miante presented a short video to introduce the Coast Guard's new Marine Information for Safety and Law Enforcement (MISLE) data base system. This structure integrates the Marine Safety Network, Vessel Identification and Documentation System, and the Law Enforcement Information System. Since no knowledgeable representative was able to attend the meeting, questions concerning MISLE were referred to the Office of Information Resources (G-MRI).

## New Business

Proposed Task Statement 02-02 - Review of Adequacy of Navigation Lights -- ***(Enclosure 11).*** The Committee decided to first review previous TSAC recommendations and NAVSAC's recent resolution on this subject before accepting further work. Ms. Hammond and Mr. Maurice volunteered to perform the initial investigation. They will disseminate information to the Committee ASAP so that it will be sufficiently informed to vote on the proposal at the next meeting.

## Public Comment

Mr. Richard Block [Gulf Coast Mariners Association (GCMA)] announced that the GCMA "Blue Book" will soon be on disk and that he finally has an answer to a long-time question: What happens when a company will not give a mariner a letter of sea service? The answer seems to be to contact the Equal Employment Opportunity Commission (EEOC). He will continue to develop additions to the GCMA blue book.
His organization has submitted five petitions for rulemaking to the Marine Safety Council: Requirements for Log Books; Work-hour Limitations for all Crewmembers on Towing Vessels (12 hours); Log Book Entries for Time on Duty (including watches); Coast Guard Appeal of Administrative Law Judge decisions
(33 CFR 20.1001); Allow an Injured Party to File an Accident Report (in addition to Master, Company, etc.); and G-MOC Policy Letter 4-00 re: travel time = 'neutral' time.

GCMA has found a Federal Railroad Administration (DOT) regulation that defines deadhead time ***to*** a job as "on duty" time, but deadhead time off the job is ***not*** "on duty" time. GCMA seeks a similar regulation from the Coast Guard.
Mr. Block also presented a letter to the MSO, Morgan City describing a captain who had had only 6 hours of sleep in a 50-hour period. Some discussion followed regarding resolution of this problem if the company involved were AWO RCP compliant. Ms. Carpenter advised that if a boat is in violation of a law, the incident should be reported to the Coast Guard; if non-compliance of a part of the RCP is suspected, AWO would like to hear about it. Mr. Block reported that GCMA has submitted 48 questions to the NTSB inspectors investigating the recent Arkansas River allision, giving them insight into problems resulting from alleged excess work hours. The Association expects them to look into the areas raised by the submission and answer those questions themselves as part of their investigation.
Whistleblower protection is available to the Nation's Truck Drivers (49 CFR 31.115); GCMA seeks the same protection for their mariners.

Mr. Richard Plant [International Organization of Masters Mates and Pilots (MM&P)] seconded the GCMA proposal that the Coast Guard require Work Hour Log Books. He praised the Crew Endurance Management System but noticed that the acronyms "CEM"/"CEMS" are used throughout the information document without actually introducing them as abbreviations for the System. On the document's page 11, concerning the 6/6 hour work schedule's not allowing sufficient sleep time, he pointed

out that industry experts have stated that 7-8 hours of sleep are normally required; so going to a 5-on/7-off watch system would still not provide the mariner the proper amount of sleep. He claimed that even on the deep-sea standard of 4/8, they are fighting fatigue. He suggested that the UTV industry seriously consider looking at a three watch system by analyzing the cost, the procedures, and policies required for moving a vessel 24 hours a day. One need only to look at the Webbers Falls incident in terms of cost of lives, fines, law suits, and reputations to realize the real cost to the industry. The three-watch system may be only one solution, but must be considered in any analysis of CEM. Alternatives may be reduced operating hours per day, or even running for several days as currently practiced and then stopping for a possible eight-hour rest period before continuing. Finally, he presented an ARTCO document for performing Safety Audits: *Salaried Supervisors are required to complete two audits per month, limited to a max of two supervisors……..Each audit will be conducted by at least one officer and one crewmember*…….. From the six-page list of items to be checked, such an audit would seem to take at least 20 minutes. He asked: "When are the mariners supposed to perform the task? If off-watch, it violates the 12-hour work rule. Mr. Plant then read the one paragraph with which he has most concern: "*ARTCO policy on wheelmen leaving the wheelhouse while on watch has been modified to permit leaving the wheelhouse to conduct an audit while on watch, safety considerations and all other circumstances permitting*". He further asked, "Under what conditions, while the engines are running, can you allow a pilot or licensed officer to leave the wheelhouse?"

Mr. Ken Parris [Offshore Marine Service Association (OMSA)] stated that while he disagreed with some of the facts in Mr. Block's comments, based on his experience, he *does* agree that enforcement of current law and regulations for substandard operators is an important factor. His primary comment, however, is that there is still a wide lack of knowledge in the understanding of the effect of STCW on mariners. He asked TSAC and the Coast Guard to do everything they can to inform mariners of the 6-month remaining time period to complete gap-closing requirements for their STCW endorsement. Mr. Parker asked what a mariner, with a 1600 GRT, Near Coastal, non-trade restricted license, could do after February 1, 2003- the end of the one-year extension period. Mr. Parris said that the mariner would have to start at the beginning with about 800 hours of classroom training that would cost approximately $34, 000, obtain required sea time, and perform all the STCW competencies for their grade of license. Mr. Maurice pointed out that a big factor for inland mariners in obtaining the required sea-going service time would be requirement for recency. Mr. Parris announced that he was working on a fact sheet that would contain all the necessary steps for the Master 1600 GRT/3000GT license holder to meet STCW requirements and would eventually posted it on OMSA's web site.

Mr. Plant announced the fact, bought out at the recent MERPAC meeting, that STCW requires officers on vessels 200 GRT/500GT or greater to have Morse Code flashing light training. That Committee recommended to the Coast Guard that the current test requirements be reduced from six to four words per minute. NMC is working on policy. He stated that several countries might recommend to the IMO that the flashing light requirement be dropped entirely.

Ms. Carpenter gave a digest of the Committee's Action Items ***(Enclosure 12).***

There was discussion on whether to hold the spring 2003 meeting in New Orleans. An outside-Washington meeting location has to be chosen based on a balance of the loss of CG Headquarters Project Officer input, with local area industry/mariner participation.

Each Committee member is to provide Mr. Miante a list of dates of any schedule conflicts for the March/April time period.

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| Captain Michael W. Brown<br>Executive Director | Mr. Jeff Parker<br>Chairman |
| Date | Date |

Encl: (1) Agenda, 9/13/02, Public Meeting
(2) Agenda, 9/12/02, Working Group Meetings
(3) Resolution on Towing Vessel Endorsements on Licenses
(4) Resolution on Increasing Maritime Security
(5) Status Report, Crew Alertness Working Group
(6) Resolution on Towing Vessel Crew Alertness
(7) Research Table, Towing Vessel Regulatory Review
(8) Table, SOLAS Certificates for International Voyages
(9) Port Safety Assessment Brochure
(10) Inland River Partnership (Power Point)
(11) Proposed Task Statement 02-02: Adequacy of Navigation Lights
(12) Action Items, 9/13/02